

**United States Bankruptcy Court  
District of Maryland**

In re **Matthew Bowers  
Nicole Bowers**

Debtor(s)

Case No. **18-18277**  
Chapter **13**

**MOTION TO MODIFY CHAPTER 13 PLAN AFTER CONFIRMATION**

NOW COMES THE DEBTORS, Matthew and Nicole Bowers, by and through their attorney, Adam M. Freiman, and moves this Honorable Court to modify the Chapter 13 Plan previously confirmed, and does say:

1. That the Debtors herein have a Chapter 13 Plan which was confirmed by this court on October 2, 2018. Debtors are substantially current with payments therein.
2. That claims have been filed in excess of the amount anticipated at the time of confirmation.
3. That the current Chapter 13 Plan provides for payment to unsecured creditors of 100% of filed claims. That although the Debtors are not able to receive a discharge in this case, they wish to remove the provision for payment of 100% to unsecured creditors.
4. That the proposed modified Chapter 13 plan which is attached hereto is made in good faith.

WHEREFORE, the Debtors request:

- a. That the court enter an order confirming the proposed modified Chapter 13 Plan; and,
- b. For such other and further relief as to the court may seem just and proper.

/s/ Adam M. Freiman  
Adam M. Freiman 23047  
115 McHenry Ave., Suite B4  
Pikesville, MD 21208

410-486-3500  
adam@pikesvillelaw.com

Attorney for Debtors

**CERTIFICATE OF SERVICE**

I HEREBY DECLARE AND AFFIRM that on this 22nd day of December, 2018, I caused service of the foregoing Motion upon the Chapter 13 Trustee, Robert Thomas, II via ECF and upon all creditors via first class mail, postage prepaid, at the addresses on the attached matrix.

/s/ Adam M. Freiman  
Adam M. Freiman